

JOHN LITTLEFIELD, 8-2-07

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IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W.A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the TRUSTEE)
FOR NATURAL RESOURCES FOR THE)
STATE OF OKLAHOMA,)
Plaintiff,)
vs.) 4:05-CV-00329-TCK-SAJ
TYSON FOODS, INC., et al.,)
Defendants.)

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VIDEO DEPOSITION OF JOHN LITTLEFIELD,
produced as a witness on behalf of the Defendants in
the above styled and numbered cause, taken on the
2nd day of August, 2007, in the City of Tulsa,
County of Tulsa, State of Oklahoma, before me, Karla
E. Barrow, a Certified Shorthand Reporter, duly
certified under and by virtue of the laws of the
State of Oklahoma.

Exhibit 15

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1 A I wouldn't say that that protects. I think
2 that is a source is designed to protect. I -- I
3 like the wording designed. I think that yes, it
4 will help, but I don't think it's the whole -- the
5 whole answer.

6 Q If you -- the reason I'm using the word land
7 applicators is because I understand that a lot of
8 people put litter down other than poultry growers?

9 A Yes, that's true.

10 Q So that's why I use the word land applicator.
11 If -- if -- what else is there for a land applicator
12 to use to guide his conduct in managing litter
13 besides the animal waste management plan?

14 A That's -- that's primarily it other than
15 speaking to somebody personally.

16 Q Well, if I have a written animal waste
17 management plan that specifies what can be done in
18 field two at Farmer Jones' place, I should be able
19 to read that plan and follow that plan if I'm an
20 applicator; correct?

21 A I think so.

22 Q In other words, I shouldn't have to call you
23 every time?

24 A That's true.

25 Q Okay. So I want to come back to this prior

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